

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Taryn A. Cregon	:	Chapter 13
	:	Case No. 21-11179-AMC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY TOYOTA MOTOR CREDIT CORPORATION

Debtors, Taryn A. Cregon, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Toyota Motor Credit Corporation hereby submit the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor avers all payments have been made to date.
9. Admitted.
10. Admitted.
11. Admitted.
12. Denied. Debtor avers the account is current to date.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: December 13, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Scott F. Waterman, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Keri P. Ebeck Esq.
Attorney for Movant *Toyota Motor Credit Corporation*
Electronic Notice to *kebeck@bernsteinlaw.com*

Dated: December 13, 2022

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor(s)